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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**AGENDA AND JOINT STATEMENT
FOR NOVEMBER 19, 2025, CASE
MANAGEMENT CONFERENCE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Case Management Order (“CMO”) Nos. 1 and 18, the Parties submit this agenda and joint statement in advance of the November 19, 2025 Case Management Conference (“CMC”).

I. Proposed Agenda for Case Management Conference

- Argument on Haugen and Bejar/Jayakumar Appeals
- Defendants’ Anticipated Motion to Strike Exhibits Filed with Plaintiffs’ Omnibus Opposition to Defendants’ MSJs
- Meta v. State AGs
 - Submission re overlap in elements of State AGs’ claims
 - State AGs’ trial sequencing
 - Clarification re order of dismissal of certain Meta Defendants

II. Joint JCCP Update

Revised Pretrial Scheduling Order. On October 21, Judge Kuhl entered revised pretrial scheduling orders for plaintiffs in Trial Pools 1, 2, and 3. **Ex. 1.**

MSJ Rulings. On October 28, Judge Kuhl heard argument on defendants’ motions for summary judgment (“MSJs”) regarding K.G.M., R.K.C., and Moore. The Court later mostly denied defendants’ MSJs, holding there are issues of material fact regarding design features. However, the Court granted YouTube’s request for summary adjudication as to R.K.C.’s failure-to-warn claim. **Ex. 2-4.** The Court separately denied plaintiffs’ MSJs as to defendants’ affirmative defenses in their entirety. **Ex. 5-7.**

Sealing-Related Rulings. On October 30, Judge Kuhl granted defendants’ request to seal (1) the names of defendants’ non-executive employees who have not been deposed in the MDL or JCCP and (2) identifying information of defendants’ employees, to the extent those names and information appear in the parties’ general causation *Sargon* filings, but otherwise denied defendants’ requests to seal as to those filings. **Ex. 8.**

Ruling on Motions to Quash. On October 20, Judge Kuhl heard argument on Meta’s and Snap’s motions to quash trial notices for Mark Zuckerberg and Adam Mosseri (Meta) and Evan Spiegel (Snap). Judge Kuhl denied the motions as to the first bellwether trial, without prejudice to Meta’s and Snap’s rights to move to quash notices for later bellwether trials. **Ex. 9.**

Hearing on Remaining *Sargon* Motions. On November 10, Judge Kuhl heard argument on defendants' *Sargon* motions directed to plaintiffs' specific causation experts in K.G.M. and R.K.C. (Bagot and Murray), and a TikTok-specific argument in defendants' *Sargon* motion directed to plaintiffs' data expert (McCarron); *Sargon* motions as to design, warnings, and data experts were submitted on the papers. No rulings on these motions have been issued.

Witness Lists and Deposition Designations. The parties will submit revised witness lists in K.G.M. and R.K.C. on November 13, limiting the number of hours of direct and cross examination of "will call" witnesses to 40 hours per side. On November 10, the parties exchanged a sample set of affirmative deposition designations for five witnesses per side across the K.G.M. and R.K.C. cases.

Verdict Form and Jury Instructions Proposals. On November 20, the parties will file proposed verdict forms and jury instructions for the Trial Pool 1 cases. Judge Kuhl will hear argument on December 12.

III. Discovery Update

A. Joint Discovery Update

A copy of the following discovery-related submissions and orders, which were (or will by November 19 have been) filed or issued since the last CMC Statement was filed, will be sent by email to Judge Gonzalez Rogers after this CMC Statement is filed (numbers refer to ECF docket numbers):

- Order re: Plaintiffs' Motion to Compel Discovery from TikTok re: Third Party Eugnia Cooney (ECF No. 2326; *see* ECF No. 2179)
- Order re: Plaintiffs' Motion to Compel TikTok and YouTube to Produce Custodial Files of TikTok Witness Samantha Kersul and YouTube Witness Tom Saffell (ECF No. 2327; *see* ECF No. 2314)
- Plaintiffs' and Meta's Statements of Recent Decision re: Joint Letter Brief ("JLB") re: Disputes Over the Addition of Sarah Wynn-Williams and Jason Sattizahn to Plaintiffs' Witness Lists (ECF Nos. 2332, 2345; *see* ECF No. 2315)
- Order re: the Addition of Sarah Wynn-Williams and Jason Sattizahn to Plaintiffs' Preliminary Witness Lists (ECF No. 2348; *see* ECF No. 2315)
- Joint Status Report ("JSR") re: Production of Custodial File of YouTube Witness Tom Saffell (ECF No. 2350)
- JSR re: TikTok Defendants' 30(b)(6) Witness Samantha Kersul Search Terms (ECF No. 2351)

B. Update on Meta’s Re-Review of Documents Withheld as Privileged During Fact Discovery Period

Meta wishes to provide the Court with an update on the privilege re-review that Meta has been undertaking. Meta has been working diligently on this re-review, and, as reflected in its prior statements that Plaintiffs invoke, Meta has attempted to keep Plaintiffs updated on its best estimates with respect to timing and volume. Meta now anticipates completing its downgrade productions toward the end of November/beginning of December. Meta will continue to make rolling productions (beyond the ~23,000 downgrade productions already made) in the interim.

Plaintiffs continue to reserve their rights to seek appropriate relief from Meta and/or this Court given Meta’s anticipated production of over 60,000 documents seven months after the close of fact discovery in this case. To date, Meta has not produced any of the 60,000 de-designated documents it represented on October 8 it would produce in early November.

IV. Joint Update Regarding Ninth Circuit Appeal

Briefing on the collateral order appeal and the cross-appeals in the Ninth Circuit was completed as of October 14, 2025. On October 26, 2025, the Ninth Circuit notified the Parties that the case has been scheduled for oral argument on January 6, 2026.

V. Joint Update Regarding School District and AG Jury Instruction Exchanges

School District Plaintiffs and Defendants exchanged initial proposed jury instructions on October 27. The Parties are currently meeting and conferring, and will submit final proposed (or disputed) jury instructions on December 15, 2025, pursuant to CMO 27 (ECF 2274).

Pursuant to the Court’s direction at the August and September 2025 CMCs, on October 10, 2025, the State AGs and Meta jointly submitted draft jury instructions and verdict forms to support trial-planning discussions. Each party also provided a brief statement regarding the proposed materials. Additionally, at the October 24, 2025 CMC and in CMO 28, the Court directed the State AGs to submit a “mapping” of the instructions to aid in discussions around trial structure. That mapping, along with a one-page cover summary and accompanying exhibits, was filed on November 12. The State AGs will be prepared to discuss both this submission and the previously filed instructions with the Court. Meta notes that it has not yet had an opportunity to review the just-filed submission.

VI. School District MSJs

A. Joint Update Regarding School District MSJs

The School District Plaintiffs filed their oppositions to Defendants' Rule 702 and summary judgment motions on November 7, 2025. The School District Plaintiffs filed their oppositions to Defendants' Rule 702 and summary judgment motions on November 7, 2025. The docket entries related to these motions are as follows. Plaintiffs have agreed, subject to Court approval, that Defendants may allocate some of their overall reply pages to a seventh omnibus reply brief, i.e., the same as applied to Plaintiffs' opposition filings.

Summary Judgment Filings

1. Motion for Summary Judgment #1 (Breathitt)

Defendants' MSJ: Dkt. 2288

Defendants' Administrative Sealing Motion: *Filed on constituent case docket*

Plaintiffs' Opposition to MSJ: Dkt. 2360 & Pls.' Omnibus Opp. (*see supra*)

Plaintiffs' Administrative Sealing Motion & Exhibits: Dkt. 2368

2. Motion for Summary Judgment #2 (Tucson)

Defendants' MSJ: Dkt. 2290

Defendants' Administrative Sealing Motion: *Filed on constituent case docket*

Plaintiffs' Opposition to MSJ: Dkt. 2369 and Pls.' Omnibus Opp. (*see supra*)

Plaintiffs' Administrative Sealing Motion: N/A (no materials filed under seal)

3. Motion for Summary Judgment #3 (Charleston)

Defendants' MSJ: Dkt. 2293

Defendants' Administrative Sealing Motion: *Filed on constituent case docket*

Plaintiffs' Opposition to MSJ: Dkt. 2373 and Pls.' Omnibus Opp. (*see supra*)

Plaintiffs' Administrative Sealing Motion & Exhibits: Dkt. 2385

4. Motion for Summary Judgment #4 (Irvington)

Defendants' MSJ: Dkt. 2294

Defendants' Administrative Sealing Motion: *Filed on constituent case docket*

Plaintiffs' Opposition to MSJ: Dkt. 2384 and Pls.' Omnibus Opp. (*see supra*)

Plaintiffs' Administrative Sealing Motion: Dkt. 2392

5. Motion for Summary Judgment #5 (DeKalb)

Defendants' MSJ: Dkt. 2289

Defendants' Administrative Sealing Motion: *Filed on constituent case docket*

Plaintiffs' Opposition to MSJ: Dkt. 2389 and Pls.' Omnibus Opp. (*see supra*)

Plaintiffs' Administrative Sealing Motion: N/A (no materials filed under seal)

6. Motion for Summary Judgment #6 (Harford)

Defendants' MSJ: Dkt. 2296
 Defendants' Administrative Sealing Motion: *Filed on constituent case docket*
 Plaintiffs' Opposition to MSJ: Dkt. 2395 and Pls.' Omnibus Opp. (*see supra*)
 Plaintiffs' Administrative Sealing Motion: Dkt. 2400

7. Plaintiffs' Corrected Omnibus Opposition ("Pls.' Omnibus Opp.")

Plaintiffs' Opposition to MSJ:

Dkt. 2414-1 [unredacted], Dkt. 2413 [redacted]

Plaintiffs' Administrative Sealing Motion & Chart of Designations:

Dkt. 2414 (motion), 2414-3 (chart)

Plaintiffs' Declaration Attaching Supporting Exhibits: Dkt. 2414-2

Plaintiffs' Supporting Exhibits: Dkt. 2358 (Exs. 1-20), Dkt. 2414-4 (Corrected Ex. 6), Dkt. 2361 (Exs. 21-40), Dkt. 2362 (Exs. 41-60), Dkt. 2363 (Exs. 61-80), Dkt. 2364 (Exs. 81-100), Dkt. 2365 (Exs. 101-130), Dkt. 2367 (Exs. 131-170), Dkt. 2370 (Exs. 171-200), Dkt. 2371 (Exs. 201-250), Dkt. 2372 (Exs. 251-300), Dkt. 2374 (Exs. 301-350), Dkt. 2375 (Dkt. 351-400), Dkt. 2376 (Exs. 401-450), Dkt. 2377 (Exs. 451-500), Dkt. 2378 (Exs. 501-550), Dkt. 2379 (Exs. 551-600), Dkt. 2414-5 (Corrected Ex. 567), Dkt. 2380 (Exs. 601-650), Dkt. 2381 (Exs. 651-700), Dkt. 2383 (Exs. 701-750), Dkt. 2386 (Exs. 751-775), Dkt. 2387 (Exs. 776-800), Dkt. 2388 (Exs. 801-825), Dkt. 2390 (Exs. 826-850), Dkt. 2391 (Exs. 851-900), Dkt. 2393 (Exs. 901-950), Dkt. 2394 (Exs. 951-1000), Dkt. 2396 (Exs. 1001-1050), Dkt. 2397 (Exs. 1051-1100), Dkt. 2398 (Exs. 1101-1143), Dkt. 2414-6 (Corrected Ex. 1117), Dkt. 2399 (Exs. 1144-1185), Dkt. 2414-7 (Corrected Ex. 1180), Dkt. 2414-8 (Ex. 1186) and Dkt. 2414-9 (Ex. 1187).

Rule 702 Filings

1. Motion to Exclude General Causation Experts

Defendants' Motion: Dkt. 2295

Plaintiffs' Opposition: Dkt. 2404

Plaintiffs' Administrative Sealing Motion: Dkt. 2405

2. Motion to Exclude General Causation Experts Based on Section 230

Defendants' Motion: Dkt. 2292

Plaintiffs' Opposition: Dkt. 2408

Plaintiffs' Administrative Sealing Motion: Dkt. 2409

3. Motion to Exclude School District Experts

Defendants' Motion: Dkt. 2291

Plaintiffs' Opposition: Dkt. 2406

Plaintiffs' Administrative Sealing Motion: Dkt. 2407

In support of their oppositions, four School District Plaintiffs submitted new declarations from previously deposed witnesses, one each in the following cases: Tucson, Charleston, Irvington, and DeKalb. Defendants are still evaluating these new declarations and reserve all rights to seek appropriate

1 relief and/or the further depositions of these individuals. In addition, by agreement of the Parties,
 2 Defendants will depose on November 20 another Irvington witness who submitted a declaration relied
 3 upon by Irvington's experts. Finally, the Parties will work to schedule in December and/or January the
 4 depositions of witnesses disclosed on Plaintiffs' witness lists who were not previously deposed.

5 **B. Defendants' Anticipated Motion to Strike Exhibits Filed with Plaintiffs' Omnibus**
 6 **Opposition to Defendants' MSJs**

7 Plaintiffs' Omnibus Opposition to Defendants' SD MSJs attached 1,187 exhibits. Defendants
 8 intend to file a motion to strike those exhibits, which Plaintiffs intend to oppose. The parties have conferred
 9 and agreed to brief Defendants' motion to strike on an accelerated timeline so that it can be heard at the
 10 November 19, 2025 CMC. Specifically, Defendants will file their motion by November 14, Plaintiffs will
 11 file their opposition by November 17, and Defendants' optional reply will be filed by November 18.

12 **VII. Meta v. State AGs**

13 **A. State AGs' Trial Sequencing**

14 The State AGs renew their request for the Court to set their trial after the first school district
 15 bellwether trial. *See* ECF 2191, at 9-10. Meta continues to object to that request. *See* ECF 2191, at 10-11.
 16 The Parties are prepared to discuss this issue with the Court.

17 **B. Clarification that Stipulation and Order of Dismissal of Certain Meta Defendants**
 18 **was Incorrectly Applied to the State AG's Docket**

19 Meta and the Bellwether School Districts filed a Stipulation and Proposed Order Dismissing
 20 Certain Meta Defendants on November 7 (ECF 2359). The Court entered that Order the same day (ECF
 21 2401). The Order was also entered on the docket of the State AGs' litigation despite the Stipulation only
 22 explicitly applying to the Bellwether School Districts. *See* 4:23-cv-05448-YGR (ECF 230). The State AGs
 23 seek to clarify that the Order of Dismissal does not apply to their action.

24 **C. Timing of Meta's Expert Witness Disclosures**

25 The State AGs have already disclosed their expert witness list. The parties also exchanged
 26 preliminary lists of Meta company fact witnesses on September 24, 2025, and the parties have agreed to
 27 exchange preliminary lists of state-specific fact witnesses on November 17, 2025. The parties never
 28 agreed to exchange expert witness lists by a particular deadline, and Meta believes it is premature to

1 provide an expert witness list when expert discovery is still ongoing and Rule 702 motions have not yet
2 been briefed. The State AGs also already have the names of all the defense expert witnesses whose
3 reports have been served to date, and any additional defense experts will be disclosed to the AGs in
4 accordance with the schedule set by the Court. Meta will provide a list of expert witnesses on a schedule
5 to be determined by the Court in advance of any AG trial.

6 The State AGs have proposed that the deadline for the disclosure of Meta's expert witness list
7 should be December 19, 2025, on the deadline to otherwise disclose experts. Meta believes it is
8 premature to set a deadline for the reasons noted above.

Respectfully submitted,

DATED: November 12, 2025

By: /s/ Lexi J. Hazam

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: November 12, 2025

By: /s/ Ashley M. Simonsen